

# **EXHIBIT B**



**U.S. Department of Justice**  
*United States Attorney*  
*Southern District of Ohio*

221 East Fourth Street  
Suite 400  
Cincinnati, Ohio 45202

Telephone: 513-684-3711  
Fax: 513-684-6710

February 22, 2023

By Electronic and Certified U.S. Mail  
Public Utilities Commission of Ohio  
c/o Angela Hawkins, Esq.  
180 E. Broad Street  
Columbus, Ohio 43215

Re: Case Nos. 20-1502-EL-UNC  
17-974-EL-UNC  
17-2474-EL-RDR  
20-1629-EL-RDR

Dear Commissioners,

This letter is sent pursuant to 28 U.S.C. S 517 to request that the Public Utilities Commission of Ohio ("PUCO") stay all discovery in the above-referenced proceedings (the "PUCO Proceedings").

As you are aware, the United States is conducting an ongoing investigation into corruption relating to Ohio House Bill 6 and action through the Public Utilities Commission of Ohio ("PUCO"). The United States' investigation has resulted in a Deferred Prosecution Agreement with FirstEnergy Corp. and an indictment of several individuals. Trial for two individuals charged in the indictment commenced in January 2023 and is underway.

The United States understands that substantial discovery is underway in the PUCO Proceedings, including written discovery and the potential for depositions of numerous individuals and entities. The PUCO Proceedings involve issues related to U. S. Department of Justice the United States' investigation, and the United States believes that continued discovery in the PUCO Proceedings may directly interfere with or impede the United States' ongoing investigation.<sup>1</sup> For that reason, the United States respectfully requests that PUCO stay the PUCO Proceedings for a

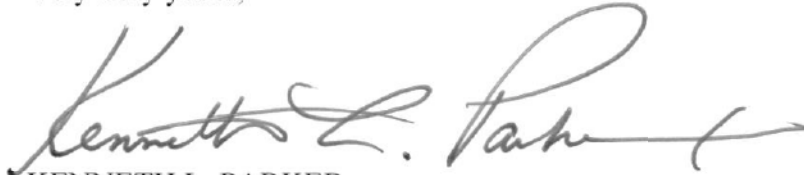
---

<sup>1</sup> PUCO has recognized the importance of not interfering with the United States' investigation. See *IN THE MATTER OF THE 2020 REWEW OF THE DELIVERY CAPITAL RECOVERY RIDER OF OHIO EDISON COMPANY, THE CLEVELAND ELECTRIC ILLUMINATING COMPANY, AND THE TOLEDO EDISON COMPANY*, Case No. 20-1629-EL-RDRR, Entry Dec. 15, 2021, at para. 14 (PUCO).

period of six months from the date of this letter. The United States reserves its right to request that the stay be extended beyond this time.

We appreciate your prompt attention to this request. Please let us know if you have any questions.

Very truly yours,

A handwritten signature in black ink, appearing to read "Kenneth L. Parker". The signature is fluid and cursive, with a long horizontal stroke at the end.

KENNETH L. PARKER  
United States Attorney

CC: Karl P. Kadon  
Emily N. Glatfelter  
Matthew C. Singer

**This foregoing document was electronically filed with the Public Utilities  
Commission of Ohio Docketing Information System on  
2/23/2023 10:33:26 AM**

**in**

**Case No(s). 20-1502-EL-UNC, 17-0974-EL-UNC, 17-2474-EL-RDR, 20-1629-EL-  
RDR**

Summary: Correspondence requesting a stay in proceedings for a period of six months electronically filed by Ms. Mary E. Fischer on behalf of Kenneth L. Parker, United States Attorney, U.S. Department of Justice